## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION II

DATE: JAN 0 6 1993

SUBJECT: Second Revision Draft Feasibility Study: L.E. Carpenter and Company Site, Borough of Wharton, Morris County, New Jersey.

FROM: Dore LaPosta: Chief

Groundwater Management Section

TO: Raymond Basso, Chief New Jersey Superfund Branch II

As requested and in accordance with the Memorandum of Interdivisional Coordination between the Emergency and Remedial Response Division (ERRD) and Water Management Division (WMD), WMD has reviewed the Second Revision Draft Revised Feasibility Study: L.E. Carpenter and Company Site, Borough of Wharton, Morris County, New Jersey, from the perspective of the Water Programs. We offer the following comments:

• Alternative 4 <u>Treated Groundwater with Infiltration</u> is more adequately described as "Soil Flushing, Groundwater Extraction and Treatment, and in-situ Bioremediation. Based on preliminary treatability study results, this alternative appears to hold the the greatest promise of meeting NCP criteria including permanence, use of alternative technologies, and compliance with ARARs.

However, further investigation into attenuated biodegradation of target compounds, and the effects of surfactants on biological activity, and surfactant transport and fate is warranted as an element of remedial design. Alternative detergents which are FDA approved direct food additives, such as sodium dodecyl sulfate; sodium dodecylbenzenesulfonate, and sorbitan mono-9-dodecanoate poly (20) (oxy-1,2-ethanediyl) may be effective and easily degraded. The potential for these and potentially other surfactants to mobilize site contaminants and to be readily degraded in the subsurface at the site should be investigated.

If you have any questions regarding these comments, please call Dennis McChesney of my staff at extension 5543.

cc: R. Hargrove, EIB

J. Josephs, NJSB II/ERRD